

FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA①
5-18-00
Sc

#010381

(Inmate Number)

SAMUEL E. PULLINS

(Name of Plaintiff)

230 SANDERSON STREET

(Address of Plaintiff)

POTTSVILLE, PA. 17901

1 : CV 00-0872
(Case Number)

COMPLAINT

vs.

SCHUYLKILL COUNTY, INDIVIDUALLY

AND IN ITS OFFICIAL CAPACITY AS DI-

RECTOR OF SCHUYLKILL COUNTY, ET AL

(Names of Defendants)

FILED
SCRANTON

MAY 16 2000

DEPUTY CLERK

RECEIVED
SCRANTON

MAY 12 2000

PER

DEPUTY CLERK

TO BE FILED UNDER: ☒ 42 U.S.C. § 1983 - STATE OFFICIALS☐ 28 U.S.C. § 1331 - FEDERAL OFFICIALS

I. Previous Lawsuits

- A. If you have filed any other lawsuits in federal court while a prisoner please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

A CIVIL SUIT AGAINST STATE OF PA, SCHUYLKILL
COUNTY, AND CITY OF POTTSVILLE MARCH 2000, WHILE
A PRISONER AT SCHUYLKILL COUNTY PRISON.

II. Exhaustion of Administrative Remedies

- A. Is there a grievance procedure available at your institution?
☒ Yes ☐ No
- B. Have you filed a grievance concerning the facts relating to this complaint?
☒ Yes ☐ No

If your answer is no, explain why not

III. Defendants

(In Item A below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use Item B for the names, positions and places of employment of any additional defendants.)

- A. Defendant COUNTY OF SCHUYLKILL is employed
as DIRECTOR OF SCH. CO. at SCH. CO. COURTHOUSE, 401 N. 2ND STREET
POTTSVILLE, PA. 17901-2520.
- B. Additional defendants SCH. CO. COMMISSIONER OFFICE IS EMPLOY-
ED AS DIRECTOR OF SCH. CO. OPERATIONS AT SCH.
CO. COMMISSIONER OFFICE, 401 N. 2ND STREET, POTTS-
VILLE, PA. 17901.

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach extra sheets if necessary.)

1. ON 10/26/99, DEFENDANTS INAPPROPRIATELY ALLOWED
THE CIRCUMSTANCES IN WHICH MY LIFE WAS AT
STAKE AND IN SERIOUS JEOPARDY. THE ADMINISTRA-
TION HAS SUCCESSFULLY ALLOWED SUCH ATTACK A-
2. GAINST MY LIFE. WHEN DURING THIS ALTERCATION
BETWEEN PLAINTIFF AND OTHER INMATES RESIDENT
GOMBZ, R., BROWN, C., AND CULBERT J. THE CORRECTION
AL OFFICER STEVE BLOSCHICHAK MADE NO ATTEMPT
3. TO SUBDUE INMATE GOMBZ, R. FROM ASSAULTING
PLAINTIFF WITH A MOP RINGER, WHEREAS DE-
FENDANT STEVE BLOSCHICHAK PAID THESE IN-
MATES TO INJURE, HARM AND/OR HURT PLAINTIFF

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. SEE PART. IV RELIEF ON ATTACHED SHEETS

2.

3.

Signed this 8TH day of MAY, 192000.

Samuel E. Pullins
(Signature of Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct.

5/8/2000
(Date)

Samuel E. Pullins
(Signature of Plaintiff)

PART. I DEFENDANTS

DATE: 5/8/2000

010381
 SAMUEL E. PULLINS
 238 SANDERSON STREET
 POTTSVILLE, PA. 17901

SCHUYLKILL COUNTY COMMISSIONER(S) OFFICE, INDIVIDUALLY AND IN ITS OFFICIAL CAPACITY AS DIRECTOR OF SCH. CO., AND HEAD OF OPERATIONS OF SCHUYLKILL COUNTY PRISON; SCH. CO. COMMISSIONER, FORREST L. SHADLE, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS COMMISSIONER OF SCH. CO.; SCH. CO. COMMISSIONER, JEROM P. KNOWLES, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY ~~AS~~ AS CONTROLLER OF COMMISSIONERS OFFICE; SCH. CO. COMMISSIONER, STANLEY H. TOBASH, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS COMMISSIONER OF SCH. CO.; SCH. CO. PRISON, INDIVIDUALLY AND IN ITS OFFICIAL CAPACITY AS DIRECTOR OF SCHUYLKILL CO. PRISON; GERALD BRITTON, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS WARDEN OF SCH. CO. PRISON; GENE BERDINER, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS DEPUTY WARDEN OF SCH. CO. PRISON; DAVID WARPINSKY, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS CAPTAIN OF SCH. CO. PRISON; MICHAEL FLANNERY, TONY KANKOWSKI, LAMOR GHERES, INDIVIDUALLY AND IN THEIR OFFICIAL CAPACITY AS LIEUTENANT(S) OF SCH. CO. PRISON; STEVE BLOSCHICHAK, PAUL ~~THE~~ TAYLOR, JOHN CARUSO, KEITH WITTING, JOE CONNOR, BILL KRUSS, TODD SETLOCK, INDIVIDUALLY AND IN THEIR OFFICIAL CAPACITY AS CORRECTIONAL OFFICERS; MATT MORGAN, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS HEARING EXAMINER OF SCH. CO. PRISON; PATTY HOAKE, CATHY KARADO, INDIVIDUALLY AND IN THEIR OFFICIAL CAPACITY AS REGISTERED NURSE(S) OF SCH. CO. PRISON; DR. HARCHARAN, INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY AS DOCTOR OF SCHUYLKILL COUNTY PRISON.

PART. III DEFENDANT

DATE: 5/8/2000

- C.) DEFENDANT, FORREST L. SHADLE, IS EMPLOYED AS COMMISSIONER OF SCH. CO., AT COMMISSIONER OFFICE, 401 N. 2ND ST. POTTSVILLE, PA. 17901.
- D.) DEFENDANT, JEROM P. KNOWLES, IS EMPLOYED AS COMMISSIONER OF SCH. CO., AT COMMISSIONER OFFICE, 401 N. 2ND ST. POTTSVILLE, PA. 17901.
- E.) DEFENDANT STANLEY H. TOBASH, IS EMPLOYED AS COMMISSIONER OF SCH. CO. AT COMMISSIONER OFFICE, 401 N. 2ND ST. POTTSVILLE, PA. 17901.
- F.) DEFENDANT SCH. CO. PRISON, IS EMPLOYED AS DIRECTOR OF SCH. CO. PRISON AT SCH. CO. PRISON, 230 SANDERSON ST., POTTSVILLE, PA. 17901.
- G.) DEFENDANT, GERALD BRITTON, IS EMPLOYED AS WARDEN OF SCH. CO. PRISON AT SCH. CO. PRISON, 230 SANDERSON ST., POTTSVILLE, PA. 17901.
- H.) DEFENDANT, GENE BERDINER, IS EMPLOYED AS DEPUTY WARDEN OF SCH. CO. PRISON AT SCHULYKILL CO. PRISON, 230 SANDERSON ST., POTTSVILLE, PA. 17901.
- I.) DEFENDANT, DAVID WARPINSKY IS EMPLOYED AS CAPTAIN OF SCH. CO. PRISON AT SCH. CO. PRISON, 230 SANDERSON ST., POTTSVILLE PA. 17901.
- J.) DEFENDANTS MICHAEL FLANNERY, LAMOR GHERES, AND ANTONY KANKOWSKI, ARE ALL EMPLOYED AS LIEUTENANTS OF SCH. CO. PRISON AT SCH. CO. PRISON, 230 SANDERS ST. POTTSVILLE, PA. 17901.
- K.) DEFENDANTS, STEVE BLOSCHI CHAK, PAUL TAYLOR, JOHN CARUSO, KEITH WITTING, JOE CONNORS, BILL KRUSS, AND TODD SETLOCK, ARE ALL EMPLOYED AS CORRECTIONAL OFFICERS AT SCH. CO. PRISON, 230 SANDERSON ST., POTTSVILLE, PA. 17901.
- L.) DEFENDANT, MATT MORGAN, IS EMPLOYED AS HEARING EXAMINER OF SCH. CO. PRISON AT SCH. CO. PRISON, 230 SANDERSON ST. POTTSVILLE, PA. 17901.
- M.) DEFENDANTS, PATTY HOAKE, CATHY KARADO IS ~~EMPLOYED~~ EMPLOYED AS REGISTERED NURSE(S) AT SCH. CO. PRISON POTTSVILLE, PA. 17901.
- N.) DEFENDANT, DR. HARCHARAN NARANG, IS EMPLOYED AS DOCTOR OF SCH. CO. PRISON AT SCH. CO. PRISON, 230 SANDERSON ST.

PART. III CONTINUE DEFENDANT DATE: 5/8/2000

0.) EACH DEFENDANT IS SUED INDIVIDUALLY AND IN HIS AND/OR HER OFFICIAL CAPACITY. AT ALL TIMES MENTIONED IN THIS COMPLAINT EACH DEFENDANT ACTED UNDER THE COLOR OF PENNSYLVANIA LAW.

PLAINTIFF DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDG AND/OR INFORMATION AND BELIEF.

DATE: 5/8/2000
Samuel E. Pullins
SAMUEL E. PULLINS

PART. II CONTINUE DATE: 5/8/2000

#010381

SAMUEL E. PULLINS
230 SANDERSON STREET
POTTSVILLE, PA. 17901

- 4.) UNDER THE 801 RULES OF COUNTY PRISON PROCEDURES THE DEFENDANT, WARDEN BRITTON NEVER RESPONDED TO MY APPEAL OF GRIEVANCE AND 11-15-99 AND 12-14-99 WITHIN 30 DAYS, WHEREAS THESE OFFICERS LIED AND FALSIFIED DOCUMENTS FICTITIOUSLY DIVESTING THE AUTHORITY OF THE COUNTY PROCEDURES IN THIS WRITE-UP ON 10-26-99. THEREFORE PLAINTIFF TRIED TO UNDI-CATE THE NATURE OF THE FACTS THROUGH GRIEVANCES,
- 5.) BUT UNFORTUNATELY THE DEFENDANT, WARDEN GERALD BRITTON REFUSE TO ACKNOWLEDGE THE MANNER OF PLAINTIFF REQUEST AND/OR GRIEVANCES TO SEEK RELIEF AND SURELY PLAINTIFF REMONSTRATE THAT THE COM-PLAINT HAVE MERIT TOWARDS THERE REMISS NEGLIGENCE OF THE INCIDENT FOR ALLOWING PLAINTIFF TO BE ASSAULTED BRUTALLY BY THESE INMATES WHILE CORRECTIONAL OFFICERS
- 6.) WAS PRESENT, THEREFORE AFTER PLAINTIFF WAS SUBDUE DEFENDANTS LET INMATE GOMEZ, R. GO TO PROCEED IN HIS ATTACK AGAINST PLAINTIFF, WHICH CAUSED SERIOUS BODILY INJURY TO PLAINTIFF, WHEREAS PLAINTIFF HAD TO RECIEVE TREATMENT AT POTTSVILLE HOSPITAL BY HAVING FOREIGN BODY PUT IN HIS RIGHT LEG, THEN DE-FENDANTS DENIED PLAINTIFF PROPER TREATMENT.
- 7.) WHEREAS DOCTOR SAID TO CORRECTIONAL OFFICERS KEITH WITTING AND JOHN CARUSO BRING PLAINTIFF BACK IN 10 TO 14 DAYS TO SEE IF FOREIGN BODY NEEDS TO BE TAKEN OUT, BECAUSE ITS SO CLOSE TO BONE WHEREAS BONE WAS CHIPED OFF AND SKIN MISSING. DOCTOR NEEDED TO LOOK AT THIS INJURY BEFORE REMOVING FOREIGN BODY.
- 8.) ON-11-12-99, SCH. CO. NURSE PATTY HOAKE TOOK FOREIGN BODY OUT PLAINTIFF LEG WITHOUT TALKING TO DOCTOR AND/OR DOCTOR PREMITION LEAVEN THE SECOND FOREIGN BODY FROM TOP IN PLAINTIFF LEG, SAYING IT WOULD BE ALRIGHT PLAINTIFF ASKED NURSE PATTY HOAKE NOT TO TAKE FOREIGN BODY OUT BECAUSE DOCTOR AT HOSPITAL SAID COME TO SEE HIM ABOUT THE FOREIGN BODY IN PLAINTIFF RIGHT LEG.

PART III STATEMENT OF CLAIM

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- 9.) PLAINTIFF ALSO TOLD DEFENDANT, PATTY HOAKE HE WAS HAVING BACK AND LEG PAIN FROM INJURIES OF THIS INCIDENT. DEFENDANT, PATTY HOAKE SAID IT WOULD GO AWAY FROM BEING IN (HOLE) SOLITARY CONFINEMENT DOING NOTHING ON THE LEG. POTTSVILLE HOSPITAL IS SENDING PLAINTIFF BILLS FROM THESE INJURIES 12-13-99,
- 10.) FROM THIS INCIDENT THAT HAPPENED UNDER SCH. CO. PRISON CARE AND/OR INVOLVEMENT OF THESE INJUSTICE THAT HAS BEEN DONE AGAINST PLAINTIFF. ALSO IN PLAINTIFF SECOND APPEAL IN FORM OF GRIEVANCE OF THIS WRITE-UP TO DEFENDANT, WARDEN BRITTON, STATING PLAINTIFF DID NO WRONG, AND ASKED THAT SOMETHING BE DONE ABOUT THIS 100 DAY IN SOLITARY CONFINEMENT, HOLE TIME.
- 11.) PLAINTIFF WAS THE ONLY INMATE GIVEN HOLE TIME, INMATES CHARLIE BROWN AND JIMMY CULBERT WASN'T WRITTEN-UP AND/OR GIVEN, HOLE TIME. INMATE GOMEZ, R. AKA FILA WAS TAKEN TO A STATE PRISON AFTER INCIDENT. PLAINTIFF (PULLINS) RECEIVED 100 DAYS IN THE (HOLE), SOLITARY CONFINEMENT.
- 12.) PLAINTIFF GAVE LIEUTENANT FLANNERY THE DOCTOR BILL AND PLAINTIFF SECOND GRIEVANCES NO RESPONSES AND/OR RELIEF IN ANY MANNER AND/OR REQUEST OR GRIEVANCE. PLAINTIFF WAS TOLD IN THE HOLE AFTER ABOUT 55 DAYS COMPLETED, HEARING EXAMINER TOLD PLAINTIFF IN THE HOLE, SOLITARY CONFINEMENT, DEFENDANT MATT MORGAN TOLD OTHER OFFICIALS TO LET PLAINTIFF OUT SOLITARY CONFINEMENT.
- 13.) AFTER A FEW DAYS OF COOLING DOWN, BECAUSE I TOLD EVERYONE FROM THE START OF THIS DEFENDANT STEVE BLOSCHICKAK PAID THESE INMATES IN SOMEWAY TO BEAT PLAINTIFF UP AND/OR HURT, INJURE IN SOMEWAY. ON 2/4/2000 PLAINTIFF WAS PUT ON THE SAME BLOCK (F) AS INMATES C. BROWN AND J. CULBERT.
- 14.) WHEREAS HIS LIFE WAS AT STAKE AND IN SERIOUS JEOPARDY. THESE TWO (2) INMATES WAS PAID BY ANOTHER CORRECTIONAL OFFICER MICHAEL FORD TO BEAT UP ANOTHER INMATE DENNIS BRANNAN PUTTING HIM IN SERIOUS INJURE AFTER THIS INCIDENT WITH PLAINTIFF AND NOTHING HAPPENED TO THESE INMATES AGAIN!

PART. IV CONTINUE STATEMENT OF CLAIM DATE: 5/8/2000

- 15.) PLAINTIFF WAS TOLD IN THE HOLE BY DEFENDANT TONY KANKOWSKI AND DEFENDANT STEVE BLOSCHICHAK ~~IF~~ PLAINTIFF OPEN HIS MOUTH ABOUT WHAT HAPPENED TO HIM, PLAINTIFF WANT LIVE TO SEE THE OUT COME.
- 16.) AFTER COMING OUT OF SOLATARY CONFINEMENT INMATES CHARLIE BROWN AND JIMMY CULBERT TOLD PLAINTIFF THAT DEFENDANT, STEVE BLOSCHICHAK PAID THEM TO BEAT PLAINTIFF UP WHEREAS THESE SAME INMATES WERE CALLED OUT BY DEFENDANTS, WARDEN GERALD BRITTON AND DEPUTY WARDEN GENE BERDINER AND
- 17.) ASKED QUESTIONS BECAUSE OTHER DEFENDANTS KEITH WITTING, JOHN CARUSO SAID THEY SHOULD HAVE BEEN THE ONE(S) PUT IN THE HOLE, AND PLAINTIFF COULD HAVE A FEW MORE INMATES TO TESTIFY AS WITNESSES.
- 18.) ON 2/9/2000, F-BLOCK REFUSED TO LOCK UP BECAUSE OF PRISON CONDITIONS: NO COMMASSARY FOR WEEKS AT A TIME, WATER BUGS ALL OVER F-BLOCK FLOOR, VENTILATION DON'T WORK WHEREAS F-BLOCK SMELLS LIKE DEAD FISH AND/OR A FECES, HUMAN WASTE, NO CLEANING FLUIDS TO KILL BACTERIA, BUTTER AND/OR OTHER FOODS ON CIELING(S) FOR YEARS, MAYBE EVEN HUMAN BODY WASTE ON CIELING(S), PAINT FALLEN OFF THE WALLS;
- 19.) PEOPLE BEING DENIED DENTAL AND MEDICAL TREATMENT ON 2/10/2000 PLAINTIFF ASKED DEFENDANT, GERALD BRITTON FOR ~~#~~ COPIES OF HIS GRIEVANCES AND/OR APPEALS PLAINTIFF SENT TO HIS PERSON ON DIFFERENT OCCASSIONS BY DEFENDANT LIEUTENANT, FLANNERY.
- 20.) DEFENDANT, GERALD BRITTON HAD NO ANSWER, BUT TO SAY LIEUTENANT FLANNERY BROUGHT THEM TO HIM, BUT HE DIDNT SEE THEM. PLAINTIFF TOLD WARDEN ABOUT THE ABOVE MATTERS ALSO TELLING DEFENDANT WARDEN GERALD BRITTON ABOUT PAIN IN PLAINTIFF RIGHT LEG AND BACK FROM THIS INCIDENT, WHEREAS DEFENDANT NURSE PATTY HOAKE HAS BEEN GIVEN PLAIN-MOLTRON FROM THE BEGINNING, ON 10/27/99.
- 21.) AND PLAINTIFF IS IN CONTINUES PAIN 24 HRS, A DAY, TALK TO DEFENDANT, WARDEN GERALD BRITTON DIDNT RESOLVE ANY REMEDIES AND/OR RELIEF.

PART. III STATEMENT OF CLAIM DATE: 5/8/2000

- 22.) ON 2/11/2000, PLAINTIFF ASKED NEW NURSE DEFENDANT, CATHY KARADO TO LOOK AT HIS RIGHT LEG AND BACK, BECAUSE PAIN IS GETTING WORSE. EXPLAINING THE ABOVE MATTERS. PLAINTIFF THEN TOLD NURSE, HOW HE TRIED TO RUN BASKETBALL, WHEREAS AFTER A FEW MINUTES INTO THE GAME.
- 23.) PLAINTIFF HAD TO STOP, BECAUSE OF BACK AND LEG PAIN. PLAINTIFF KNEE, ANKLE IS SWOLLEN, HIP JOINT FEELS NUMB AND WEAK WITH A SHOTING PAIN GOING UP THE BACK OF MY RIGHT LEG TO THE LOWER PART OF MY BACK, WHERE AS MY LEG HAS STARTED SWOLLEN.
- 24.) PLAINTIFF TRY GET UP AND DOWN THE TOP BUNK BED, WHEREAS THERES NO CORRECT WAY TO GET UP AND DOWN FROM THE TOP BUNK BED, BECAUSE THERES NO LATTER. PLAINTIFF RIGHT LEG GIVES OUT WITH A SHOTING PAIN FROM THE INJURED PART OF PLAINTIFF RIGHT LEG AND BEING LOCKED UP 24 HRS, A DAY FOR 100 DAYS HAS PLAYED A PART OF MAKING INJURY WORSE.
- 25.) DEFENDANT, NURSE CATHY KARADO SAID SHE WOULD LOOK AT IT AND PUT PLAINTIFF ON THE DOCTOR LIST. ON 2-16-2000, PLAINTIFF WAS CALLED UP TO SEE DOCTOR NARANG ABOUT 1:30 P.M. AND TOLD HIM WHAT HAPPEN TO ME FROM THE INJURY OF BEING HIT WITH A MOP RANGER ON F-BLOCK, BY ANOTHER INMATE.
- 26.) PLAINTIFF NEVER HAD THIS FEELING IN MY LEG AND/OR BACK BEFORE THIS INCIDENT, MY KNEE(CAP), ANKLE IS SWOLLEN, HIP JOINT FEELS NUMB AND WEAK WITH A SHOTING PAIN GOING UP THE BACK OF MY RIGHT LEG TO THE LOWER PART OF MY BACK ALL ON THE RIGHT SIDE.
- 27.) DEFENDANT, DOCTOR NARANG LAYED ME DOWN ON A BED IN THE MEDICAL(ROOM), AND MOVED MY LEG, AT DIFFERENT ANGLES, PLAINTIFF BEING IN PAIN AT ALL ANGLES. PLAINTIFF TOLD DOCTOR NARANG HE TRIED TO PLAY BASKETBALL, BUT MY LEG AND BACK WAS IN WORSE PAIN WITH IN MINUTES, PLAINTIFF ALSO TOLD DEFENDANT, DR. NARANG WHAT DEFENDANT, PATTY HOAKE ~~DID~~ DID.
- 28.) DEFENDANT, DR. NARANG PRESCRIBED PLAINTIFF MEDICATIONS RELAFEN 500 AND VIATSON 418 TWICE A DAY ON 2-17-2000, PLAINTIFF ASKED DEFENDANT, NURSE CATHY KARADO FOR MEDICATION DEFENDANT, NURSE CATHY KARADO SAID IT WASNT IN YET, BUT IT WOULD BE HERE TOMORROW.

PART. IV STATEMENT OF CLAIM

DATE: 5/8/2000

- 29.) ON 2-18-2000, PLAINTIFF ASKED LIEUTENANT FLANNERY FOR MEDICATION THE DR. NARANG PRESCRIBED FOR HIS BACK AND LEG. DEFENDANT, FLANNERY SAID IT DIDN'T COME IN, YET, AND DEFENDANT CATHY KARADO WASN'T COME IN TODAY BECAUSE OF WHEATER.
- 30.) PLAINTIFF ASKED 2ND SHIFT, LIEUTENANT LAMOR GHERES FOR PRESCRIBED MEDICATION, HE SAID THERE'S NOTHING IN THE BOOK AND/OR PACKED FOR PLAINTIFF. ON 2-19 AND 2/20/2000 BOTH DEFENDANTS, LIEUTENANTS FLANNERY AND GHERES TOLD PLAINTIFF SAME THING MEDICATIONS NOT HERE YET, AND THERE'S NOTHING IN THE BOOK FOR PLAINTIFF.
- 31.) ON 2-21-2000, PLAINTIFF ASKED THE DEFENDANT, CATHY KARADO WHY PLAINTIFF DIDN'T GET ANY MEDICATION FOR THE LAST 4 DAYS FOR PAIN AND SWOLLEN LEG. DR. NARANG PRESCRIBED TO PLAINTIFF FOR BACK AND LEG.
- 32.) PLAINTIFF TOLD DEFENDANT CATHY KARADO WHAT DEFENDANTS LT. FLANNERY AND LT. GHERES TOLD PLAINTIFF THE PAST FOUR DAYS AND ASKED WHY PLAINTIFF HAVEN'T BEEN GETTING MEDICATION FOR PAIN AND SWOLLEN.
- 33.) PLAINTIFF WAS TAKEN TYLENOL AND MOLTRON UP TO THIS POINT. DEFENDANT CATHY KARADO SAID ITS HERE THEN GAVE PLAINTIFF A PILL WITH 451 INGRAVED ON IT. PLAINTIFF HAS TAKEN THIS PILL IN THE PAST MONTHS IN THE HOLE FROM DEFENDANT PATTY HOAKE, ITS A STRONGER MOLTRON.
- 34.) PLAINTIFF SAID THIS ISN'T WHAT DR. NARANG PRESCRIBED FOR HIM, BECAUSE I WAS TO GET TWO DIFFERENT PILLS RELAFEN 500 AND WATSON 418 TWICE A DAY. DEFENDANT CATHY KARADO INSIST DR. NARANG PRESCRIBED IT. PLAINTIFF HE WANTS TO SEE DR. NARANG AGAIN, BECAUSE HE FOR A FACT THIS ISN'T WHAT DR. NARANG ORDERED FOR PLAINTIFF.
- 35.) PLAINTIFF, ALSO SAID THIS PILL 451 MOLTRON WAS ON THE MEDICATION CART ALL THE TIME. PLAINTIFF SEEN LT. FLANNERY AND LT. GHERES GIVEN THIS PILL 451 MOLTRON TO INMATE GARY MILLER FROM 2-17 TO 2/20/2000 FOR A BUMP THE SIDES OF A TENNIS BALL IN HIS RECTUM. PLAINTIFF, EVEN TOOK THIS PILL 451 MOLTRON A FEW TIMES THE PAST FEW DAYS.

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- 36.) DR. NARANG SAID STOP GIVEN PLAINTIFF MOLTRON BECAUSE IT WASN'T DOING ANYTHING FOR HIM. PLAINTIFF ASKED DEFENDANTS CATHY KARADO, LT. FLANNERY, AND LT. GHERES NUMEROUS TIMES TO MOVE HIM OFF THE TOP TIER AND OFF TOP BUNK BED, BECAUSE THEY DON'T HAVE LATTERS, IT HURT TRYIN TO GET UP IN BED AND GOING UP AND DOWN STAIRS.
- 37.) ON 2/21/2000, PLAINTIFF SIGNED DOCTOR LIST BECAUSE PLAINTIFF IS BEING DENIED AND REFUSED MEDICATION PRESCRIBED BY DEFENDANT, DR. NARANG. PLAINTIFF SAID HE'S BEING CHARGED \$5.00 TO SEE DEFENDANT, DR. NARANG FROM A INJURY THAT HAPPEND IN, SCH. CO. PRISON.
- 38.) ON 2-21-2000 PLAINTIFF WROTE A REQUEST AND/OR GRIEVANCE FORM OUT TO WARDEN GERALD BRITTON, WHEREAS HE TOLD PLAINTIFF ON 2-10-2000 TO GIVE HIS REQUEST AND/OR GRIEVANCE TO LT. FLANNERY, PLAINTIFF GAVE LT. FLANNERY HIS REQUEST SLIP AT 1:12 P.M AFTER EXPLAINING THE ABOVE MATTERS.
- 39.) DEFENDANT FLANNERY TOLD PLAINTIFF THE DOCTOR WAS COMING TODAY AND PLAINTIFF WOULD BE MOVED, OF THE TOP TIER AND ON A BOTTOM BED. PLAINTIFF DIDNT SEE THE DOCTOR AND PLAINTIFF WASN'T MOVED DOWNSTAIRS, AT 8:30 THAT NIGHT MEDICATION CART 2ND SHIFT LT. LAMOR GHERES CAME ON THE BLOCK.
- 40.) PLAINTIFF ASKED HIM WHEN HE'S TO MOVE TO THE BOTTOM TIER AND BOTTOM BUNK BED. DEFENDANT, LT. GHERES SAID I'M NOT MOVING YOU ANYWHERE, THEN TRIED TO GIVE PLAINTIFF A MOLTRON ALL WHITE PILL, WHEREAS DEFENDANT, CATHY KARADO GAVE PLAINTIFF A 451 RED MOLTRON.
- 41.) PLAINTIFF SAID THE DOCTOR DIDNT ^{PRESCRIBE} ~~PRESSURE~~ THAT TO HIM. PLAINTIFF REFUSE TO TAKE IT, SO DEFENDANT, LT. GHERES TRIED PREVOCING PLAINTIFF CALLING PLAINTIFF OUT HIS NAME, POINTING AT PLAINTIFF CELL ON THE TOP TIER SAYING GO LOCK UP PAL.
- 42.) PLAINTIFF SAID I'M GOING, AS HE BEGAN TELLING HIM I'M BEING DENIED MEDICATION THAT THE DOCTOR PRESCRIBED TO HIM AND I'M IN PAIN 24 HOURS A DAY WHEREAS THE DOCTOR SAID I'M TO GET THIS MEDICATION

PART II STATEMENT OF CLAIM DATE: 5/8/2000

- 43) PLAINTIFF WAS MOVED TO THE HOLE AND WROTE-UP. 2-22-2000, PLAINT ASKED TO SEE LT. FLANNERY AT ABOUT 9:00 AM. PLAINTIFF GAVE LT. FLANNERY ANOTHER REQUEST AND/OR GRIEVANCE TO GIVE THE DEFENDANT, WARDEN, GERALD BRITTON ABOUT THE ABOVE MATTER.
- 44) DEFENDANT, CAPTAIN DAVID WARPINSKY BROUGHT THIS ONE BACK TO ME. DEFENDANT, CAPTAIN WARPINSKY WROTE ON THESE REQUEST AND/OR GRIEVANCE AND CAME BACK WITH A NOTE TALKING ABOUT HE CALLED DR. NARANG WHICH IS NOT TRUE.
- 45) PLAINTIFF TOLD CAPTAIN WARPINSKY WHAT HAPPENED THE NIGHT BEFORE HE SAID HE'LL LOOK INTO IT, AT ABOUT 10:30 THAT SAME MORNING, PLAINTIFF ASKED CORRECTIONAL OFFICER CAROL WORKING THE BLOCK TO PLEASE GET PLAINTIFF SOMETHING FOR PAIN HIS BACK AND LEG IS HURTTING.
- 46) CORRECTION OFFICER, CAROL CAME BACK WITH DEFENDANT CATHY KARADO WHO GAVE ME A MOLTRON. PLAINTIFF SAID TO CATHY KARADO IF DR. NARANG PRESCRIBED MOLTRON WHY DIDNT I GET THIS MEDS FROM 16TH THRU. 20TH OF FEB., 2000 AND L.T. FLANNERY SAID MY MEDICATION WASNT BACK, YET.
- 47) PLAINTIFF SEEN BOTH LT. FLANNERY AND LT. GHERES GIVING WHITE MOLTRON AND THIS 451 MOLTRON, NOW PLAINTIFF WAS WROTE-UP ON ANOTHER MISCONDUCT FOR BEING IN PAIN AND BEING DENIED MEDICAL TREATMENT AS WELL AS PRESCRIBED MEDICATION, ALSO PUT IN THE HOLE, SOLITARY CONFINEMENT FOR THESE REASONS.
- 48) ON 2-22-2000, 9:00 PM. MEDICATION, DEFENDANT LT. LAMOR GHERES COMES TO MY CELL #7-E BLOCK, SOLITARY CONFINEMENT AND SAID ARE YOU GOING TO REFUSE THIS MEDICATION TONIGHT. PLAINTIFF SAID HE DON'T HAVE ANYTHING TO SAY, BECAUSE DEFENDANT, LT. GHERES YOU'RE TRYING TO HARASS PLAINTIFF AGAIN. PLAINTIFF SAID JUST GIVE HIM HIS MEDICATION.

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- 49.) PLAINTIFF PUT HIS HAND UNDER THE DOOR, DEFENDANT LT. GHERES THROW THE PILL WHITE MOLTRON ON THE FLOOR AND WALKED OFF WITH CORRECTIONAL OFFICER JOE CONNORS PRESENT OF COURSE, PLAINTIFF ASKED FOR ANOTHER PILL, DEFENDANT, LT. GHERES REFUSED.
- 50.) PLAINTIFF SAID TO CORRECTION OFFICER (DEFENDANT), YOU'RE NOT GOING TO WRITE THAT UP ARE YOU, I'M IN PAIN AND THIS IS A GAME TO YOU'S PEOPLE.
- 51.) ON 2-23-2000, PLAINTIFF SEEN DEFENDANT, CATHY KARADO 9:00 AM. MEDICATION ASKED FOR PAIN MEDICATION FOR MY BACK AND LEG DEFENDANT GAVE PLAINTIFF A MOLTRON WHITE PILL. PLAINTIFF TOLD HER DEFENDANT LT. LAMOR GHERES CAME TO PLAINTIFF CELL #7-E-BLOCK LAST NIGHT WITH A MOLTRON.
- 52.) PLAINTIFF PUT HIS HAND UNDER THE DOOR HE THROW IT ON THE FLOOR AND WALKED OFF WITH THE DEFENDANT, CORRECTION OFFICER JOE CONNORS, WHO WROTE PLAINTIFF UP THE NIGHT BEFORE, THIS IS HARASSMENT AND DEFENDANT, CATHY KARADO TOOK THE MOLTRON, GAVE PLAINTIFF A MOLTRON AND LEFT THE BLOCK.
- 53.) PLAINTIFF THEN SEEN CAPTAIN DAVID WARPINSKY AFTER WRITTING OUT A GRIEVANCE AND/OR REQUEST FORM ABOUT THE INCIDENT WITH DEFENDANTS, LT. GHERES AND C/O CONNORS. DEFENDANT, CAPTAIN WARPINSKY SAID HE DIDN'T READ THE REQUEST, YET.
- 54.) WHEREAS PLAINTIFF WROTE OUT THIS REQUEST AND/OR GRIEVANCE TO DEFENDANT WARDE, GERALD BRITTON ON 2-23-2000, PLAINTIFF SEEN DEFENDANT, CATHY KARADO ABOUT 4:12 PM. AN ASKED FOR PAIN MEDICATION DEFENDANT DR. NARANG ORDER/PREScribed FOR ~~BACK~~ BACK AND LEG.
- 55.) PLAINTIFF ASKED DEFENDANT, CATHY KARADO WHEREAS PLAINTIFF SIGNED TO SEE DR. NARANG 2/21/2000, BECAUSE MOLTRON ISN'T DOING ANYTHING FOR THE PAIN, SHE SAID ITS SCH. CO. PRISON POLICY NOT TO GIVE ANYTHING STRONGER THEN MOLTRON.

PART. III STATEMENT OF CLAIM DATE: 5/8/2000

- 56.) ON 2/25/2000, PLAINTIFF WAS GOING TO SEE THE COUNSELOR JOE KORDINSKY TO CALL HE FAMILY GINA ANDREWS TO TELL HE WHATS BEING DONE TO PLAINTIFF, AFTER THIS PHONE CALL PLAINTIFF STARTED GOING BACK TO THE BLOCK, THE HOLE.
- 57.) DEFENDANT, CATHY KARADO CALLED PLAINTIFF TO MEDICAL DEPT, AND SAID SHE WAS TALKING TO DR. NARANG AND HE PRESCRIBED PLAINTIFF A RED PILL WITH LOWDINE 400 ON IT.
- 58.) PLAINTIFF TOLD DEFENDANT CATHY KARADO, HE SIGNED UP TO SEE DR. NARANG THIS WEEK ABOUT MEDECATION, BECAUSE PLAINTIFF IS BEING GIVEN MEDS THAT WAS NOT PRESCRIBED TO HIM AND BEING DENIED TO SEE DR. NARANG. ON 2-16-2000, PLAINTIFF WAS TO GET RELAFEN 500 1 1/2 TABLETS AND WATSON 418 1 TABLET FOR SWOLLEN AND TO RELAX MUSCLE.
- 59.) ON 2/26/2000 PLAINTIFF WAS GIVEN (1) ONE RED PILL WITH THE INGRAVING LOWDINE 400 ON IT A DAY. PLAINTIFF SIGNED - UP TO SEE DR. NARANG. ON 3/1/2000 PLAINTIFF APPEARED WRITE-UPS 2035 AND 4047 AND GAVE THIS REQUEST AND/OR GRIEVANCE TO LT. FLANNERY.
- 60.) ON 3/3/2000, PLAINTIFF DOOR OPEN, CELL E-BLOCK #12 SOLITARY CONFINEMENT DOING HOLE TIME (30 DAYS) PLAINTIFF CELL E-BLOCK HAS ONLY ONE BED IN IT. CORRECTIONAL OFFICER, PAUL TAYLOR TRIED TO BRING A INMATE OFF THE STREET AND PUT HIM IN CELL WITH PLAINTIFF WITHOUT BEING DELOUSED AND/OR ~~SHOWER~~ SHOWER.
- 61.) PLAINTIFF TOLD DEFENDANT, PAUL TAYLOR HOW IS HE TO GET AROUND THIS SMALL CELL #12, E-BLOCK WITH SOME ONE LAYING ON THE FLOOR, WHEREAS THESE CELLS DON'T HAVE NIGHT LIGHTS, NO VENTILATION ON THE BLOCK-E AND/OR ANY BLOCKS WHEREAS ITS HARD FOR PLAINTIFF TO GET AROUND WITH HIS BACK AND LEG IN CONTINUES PAIN.
- 62.) PLAINTIFF REFUSED TO LET ANYONE MOVE IN, WHEREAS DEFENDANT PAUL TAYLOR THREATIN TO WRITE-UP PLAINTIFF. PLAINTIFF TOLD DEFENDANT PAUL TAYLOR TO GO AHEAD. ON 3/8/2000, PLAINTIFF FINALLY SEEN DR. NARANG THIS AFTERNOON AND TOLD HIM ABOUT THE ABOVE MATTERS.

PART. IV STATEMENT OF CLAIM DATE: 5/8/2000

- 63.) DEFENDANT DR. NARANG PRESCRIBED PLAINTIFF TO MEDICATION THAT PLAINTIFF WAS TO GET ON 2/16/2000 RELAFEN 500(1/2) TABLETS, AND WATSON 418 (1) TABLET. IT TOOK THREE (3) DAYS TO GET THESE MEDICATIONS. PLAINTIFF SIGNED UP TO SEE DEFENDANT DR. NARANG AT 9:00 AM, 3-21-2000, BECAUSE 10 DAYS OF TAKEN RELAFEN 500 1 1/2 TABLETS, AND WATSON 418(1) WAS TO A CLOSE.
- 64.) DEFENDANT, CATHY KARADO CAME ON E-BLOCK ABOUT 4:00 PM. TELLING PLAINTIFF AND OTHER INMATES THERE WAS NO DOCTOR TODAY AND DR. NARANG, SAID PUT PLAINTIFF ON SAME MEDICATION FOR SEVEN MORE DAYS. AFTER THAT PLAINTIFF CANT HAVE WATSON 418 ANY MORE. BUT PLAINTIFF CAN HAVE RELAFEN 500 ANY TIME HE WANTS IT.
- 65.) PLAINTIFF TOLD DEFENDANT CATHY KARADO, WHAT AM I TO DO FOR PAIN, WHEREAS RELEFEN 500, IS ANTI INFLAMMATORY - REDUCES INFLAMATION AND/OR SWOLLEN. WATSON 418, IS MUSCLE RELAXER - RELAXES SMOOTH MUSCLE, IS WHAT TAKES THE PAIN AWAY TO A POINT, WHEREAS PAIN IS REDUCED.
- 66.) THE SWOLLEN IS GONE, SO THE WRONG MEDICATION IS BEING TAKEN. ON 3-22-2000 PLAINTIFF SEEN IN-DUAL FROM OFFICE OF ATTORNEY GENERAL, FROM MIKE FISHER OFFICE. HE AND PLAINTIFF TALKED ABOUT THE ABOVE MATTERS AFTER OUR MEETING, HE WENT AND PULLED PLAINTIFF MEDICAL RECORDS AS WELL AS (3) THREE WRITE UPS AND SAID HE'LL GET BACK TO PLAINTIFF.
- 67.) ON 3-30-2000, PLAINTIFF SIGNED DR. NARANG LIST AT ABOUT 11:45 AM, WHEREAS I'VE BEEN ASKING TO SEE DR. NARAG ABOUT (2) TWO WEEKS NOW, TO THIS POINT ITS REALLY HARD TO DEAL WITH THE PAIN FROM LEG AND BACK INJURE.
- 68.) ON 4/3/2000 PLAINTIFF SIGNED UP TO SEE DEFENDANT DR. NARANG, PLAINTIFF WAS PUT BACK ON MEDICATION 418 WATSON (1) TABLET A DAY WITHOUT SEEING DR. NARAG.

PART. IV STATEMENT OF CLAIM DATE: 5/8/2000

- 69.) ON 4/6/2000 PLAINTIFF ASKED DEFENDANT, CATHY KARADO TO SEE DR. NARANG AGAIN, BECAUSE PLAINTIFF HAVEN'T SEEN HIM IN ABOUT (3) THREE WEEKS. WHERE AS DEFENDANT, CATHY TOOK PLAINTIFF OFF THIS MEDICATION WATSON 418 AND PUT PLAINTIFF BACK ON IT WITHOUT SEEING AND/OR EXPLAINING ANY SYMPTOMS TO DOCTOR.
- 70.) ON 4-7-2000, PLAINTIFF WAS GIVEN NO MEDICATION THAT MORNING AND RELAFEN 500 (1) TABLET THAT NIGHT. WHEREAS PLAINTIFF IS TO GET WATSON 418 AND RELAFEN 500 (1/2) TABLETS TWICE A DAY. ON 4-8-2000, PLAINTIFF DIDN'T GET ANY MEDICATION THAT MORNING AND A MOLTRON SATURDAY NIGHT.
- 71.) ON 4/9/2000, PLAINTIFF DIDN'T GET ANY MEDICATION. ON 4/10/2000, PLAINTIFF WENT TO GET MEDICATION THAT MORNING PLAINTIFF CAME TO MEDICATION CART DEFENDANT, CATHY KARADO TOLD PLAINTIFF "YOU CAN GET TYLENOL OR NOTHING AT ALL." PLAINTIFF TOOK NOTHING SAYING HE WOULD LIKE TO SEE THE DOCTOR BECAUSE I'M IN CONTINUES PAIN 24 HOURS A DAY.
- 72.) ON 4/10/2000 PLAINTIFF WROTE OUT A GRIEVANCE AND/OR REQUEST TO DEFENDANT WARDEN, GERALD BRITTON ABOUT THE ABOVE MATTERS AND GAVE THE GRIEVANCE TO LT. FLANNERY. ON 4/10/2000, PLAINTIFF WAS CALLED OUT TO SEE DR. NARANG THAT AFTER NOON. DEFENDANT, DR. NARANG PRESCRIBED A STRONGER FORM OF WATSON 25(S) 2 1/2 TABLETS TWICE A DAY FOR 2 WEEKS.
- 73.) ON 4/10/2000 PLAINTIFF WROTE U.S. DEPT. OF EDUCATION, THE WANAMAKER BUILDING, SUITE 515, 100 PENN. SQUARE EAST PHILADELPHIA, PA. 19107 CASE # 03004020. ON 4/21/2000, PLAINTIFF RECIEVED A LETTER FROM ATTORNEY GENERAL OFFICE MIKE FISHER HAS REFERRED CASE TO CRIMINAL LAW DIVISION AND RECOMMEND THAT PLAINTIFF CONSULT A LAWYER.
- 74.) ON 4/22/2000, U.S. DEPARTMENT OF EDUCATION DIRECTED PLAINTIFF TO DEPARTMENT OF JUSTICE FOR THAT AGENCY ASSISTANCE.

PART. IV STATEMENT OF CLAIM

DATE: 5/8/2000

- 75.) ON 4-23-2000 AT 10:00 PM. LOCK-UP, F-BLOCK RESIDENTS REFUSED TO LOCK-UP, BECAUSE THERE WAS NO CHANGES ~~IN~~ ANY CONDITIONS. COMMISSARY (3) DAYS LATE WHEREAS RESIDENTS SHOULD HAVE GOTTEN IT ON 4-20-2000. COMMISSARY HAS BEEN COMING LATE AND/OR NOT AT ALL, SOMETIME GOING 2 OR 3 WEEKS AT A TIME FOR LAST 2½ MONTHS. OTHER CONDITIONS: WHEREAS WATER
- 76.) BUGS ARE ALL OVER F-BLOCK AND E-BLOCK (HOLE) FLOORS; CRACKS AND/OR GAPS IN CONCRETE IN FRONT OF CELLS; UNVENTILATED BLOCKS AND/OR VENTILATION DON'T WORK WHEREAS F-BLOCK, AND E-BLOCK SMELLS LIKE DEAD FISH AND/OR DEAD FECES NOTHING TO KILL BACTERIA, SINGLE ORGANISMS CAUSING DISEASE; BUTTER AND OTHER FOOD PARTICALS ON THE WALLS AND CEILING FOR YEARS
- 77.) PAINT FALLEN OFF THE WALLS IN CELLS AND ON THE BLOCKS; CELLS LECKING WATER; SHOWERS BROKE AND CONTINUES RUNNING WATER; CELLS SINK BROKEN CONTINUES RUNNING WATER, COLD AND/OR HOT WATER DON'T WORK; TABLES MISSING PEOPLE EATING ON THE FLOOR; TOILETS BROKEN; VENTS SMELL LIKE DEAD FISH AND/OR DEAD FECES; NO LATTERS FOR BUNK BEDS; PEOPLE SLEEPING ON THE FLOOR;
- 78.) REQUEST AND/OR GRIEVANCE FORMS NEVER GET ANSWERED BY OFFICIALS; WARDEN, GERALD BRITTON, DEFENDANT, DEPUTY WARDEN GENE BERDINER, CAPTIAN DAVID WARPINSKY AND/OR COUNSELORS JOE AND CRY JACK.
- 79.) PLAINTIFF AND OTHER RESIDENTS ARE BEING DENIED DENTAL CARE AND/OR MEDICAL TREATMENT CAUSING, NEGLIGENCE, MALPRACTICE, DELIBERATE INDIFFERENCES, SERIOUS MEDICAL NEEDS, DOCTOR ORDERS NOT CARRIED OUT, DELIBERATE INDIFFERENCE BY OFFICIALS, DENYING AND/OR DELAYING ACCESS TO MEDICAL CARE, OFFICIALS INTERFERING WITH PRESCRIBED TREATMENT.
- 80.) UNQUALIFIED MEDICAL STAFF, NOT ENOUGH STAFF AND/OR MEDICAL STAFF, INADEQUATE FACILITIES MAKE PROFESSIONAL CARE INADEQUATE WHEREAS GCH-Co. PRISON IS CONTINUOUSLY OVER OFFICIAL CAPACITY OF 140 INMATES.

PART. IV STATEMENT OF CLAIM DATE: 5/8/2000

- 81.) WHEREAS CONTINUES COUNT IS BETWEEN 210 TO 245 INMATES AT ALL TIMES. SCH. CO. PRISON, JUST SETTLED OUT OF COURT ON A CONDITION CASE IN UNITED STATES DISTRICT COURTS WITH A INMATE, MIKE SPENA.
- 82.) PLAINTIFF PUT IN THE HOLE, (SOLITARY CONFINEMENT E-BLOCK CELL #8 FROM 10/26/99 TO ABOUT 12/15/99, BECAUSE BEFORE SCH. CO. PRISON CLEANED E-BLOCK AND PAINTED IT, WHEREAS PLAINTIFF LIVED IN HUMAN WASTE AND/OR HUMAN FECES ON CELL CEILING AND WALLS AND ALL OVER THE E-BLOCK.
- 83.) ON 4/23/2000 F-BLOCK INMATES CALLED NEWS STATIONS CHANNEL (16)(22) ALSO HAVING FAMILY MEMBERS CALLING SCH. CO. PRISON ABOUT THESE MATTERS ASKING TO TALK TO WARDEN, GERALD BRITTON; DEPUTY WARDEN, GENE BERDINER; CAPTAIN, DAVID WARPINSKY ABOUT MATTERS.
- 84.) 4/25/2000, PLAINTIFF MEDICATION WATSON 25(S) 2 1/2 TABLETS TWICE A DAY 2 WEEKS IS UP, DEFENDANT CATHY KARADO DIDN'T GIVE PLAINTIFF ANY MEDICATION FOR PAIN PLAINTIFF ASKED FOR TYLENOL ALSO ASKING TO BE PUT ON DOCTOR LIST
- 85.) 4/26/2000, PLAINTIFF WENT UP TO MEDICATION CART AT 9:00 AM. MEDS, AND ASKED DEFENDANT CATHY KARADO FOR PAIN MEDICATION GIVING PLAINTIFF A MOLTRON. PLAINTIFF ASKED TO BE PUT ON DOCTOR LIST AGAIN. PLAINTIFF ASKED TO SEE LT. FLANNERY ON F-BLOCK ABOUT 11:30 AND EXPLAIN THE ABOVE MATTERS ALSO TELLING HIM HOW I'VE DONE EVERYTHING POSSIBLE TO SEEK RELIEF AND/OR REMEDIES IN PAIN FROM A ON GOING INJURY IN SCH. CO. PRISON.
- 86.) PLAINTIFF SEEN DEFENDANT DR. NARANG ON 4/27/2000, DR. NARANG ASKED PLAINTIFF HOW LONG HE WAS GOING TO BE IN SCH. CO. PRISON, BECAUSE HE WOULD LIKE TO RUN SOME TESTS ON PLAINTIFF AFTER PLAINTIFF EXPLAINED WHAT WAS WRONG WITH HIM IN HIS BACK AND LEG.

PART. III STATEMENT OF CLAIM DATE: 5/8/2000

- 87.) DEFENDANT, DR. NARANG LOOKED AT MEDICAL RECORDS WHEREAS PLAINTIFF MEDICAL RECORDS OF THIS INCIDENT AND ALL THAT HAPPENED IN THIS INCIDENT WAS MISSING UP TO THIS POINT, PLAINTIFF FIRST SEEING DOCTOR NARANG.
- 88.) WHEREAS PLAINTIFF HAS SEEN PARTS OF THIS INCIDENT AND VISITS TO MEDICAL RECORDS AS DEFENDANT PATTY HOAKE HAS WRITTEN PLAINTIFF COMPLAINTS AND/OR CARE ABOUT HIS LEG AND BACK, ALSO WHERE PLAINTIFF HAD TO GO BACK AND FORTH TO GET WOUND CLEANED OUT.
- 89.) AND WHEREAS PLAINTIFF HAD TO GO TO SCH. CO. PRISON MEDICAL DEPT. TO HAVE FOREIGN BODY TAKEN OUT. DR. NARANG ASKED PLAINTIFF WHY WASN'T ANY OF THIS IN HIS MEDICAL FILE. PLAINTIFF TOLD DOCTOR DR. NARANG POTTSVILLE HOSPITAL SHOULD HAVE RECORDS OF THIS INCIDENT.
- 90.) THEN DEFENDANT, CORRECTIONAL OFFICE TODD SETLOCK STATED INMATE PULLINS IS GIVEN TRUE FACTS ABOUT WHAT HE'S SAYING, BECAUSE HE WAS THERE ON DIFFERENT OCCASSIONS WHEREAS HE HEARD AND SEEN PLAINTIFF TELL DEFENDANTS PATTY HOAKE AND CATHY KARADO EVERYTHING HE'S SAYING. DEFENDANT, DR. NARANG SAID HE WOULD PRESCRIBE MEDICATION TELLING PLAINTIFF HE COULD LEAVE NOW.
- 91.) ON 4/28/2000 ABOUT 9:00 AM. MEDICATION DEFENDANT CATHY KARADO TOLD PLAINTIFF DR. NARG PRESCIBED TYLENOL TO PLAINTIFF. PLAINTIFF ASKED TO BE PUT BACK ON DOCTOR LIST WHEREAS THROUGHOUT THIS MATTER DEFENDANT CATHY KARADO HAS TAKEN PLAINTIFF OFF AND ON MEDICATION WITHOUT SEEING DR. NARANG.
- 92.) 4-30-2000, PLAINTIFF WROTE COMMISSIONERS OFFICE, INFORMING COMMISSIONERS FORREST L. SHADLE, JEROM P. KNOWLES, AND STANLEY H. TOBASH ABOUT THE ABOVE MATTERS LOOKING FOR RELIEF AND/OR REMEDIES RESOLVED IN THESE MATTERS. NO RESPONDS.

PART IV STATEMENT OF CLAIM DATE: 5/8/2000

- 93.) ON 5/1/2000, PLAINTIFF SEEN DEFENDANT, CATHY KARADO 9:00 AM. MEDICATION GIVEN TYLENOL, PLAINTIFF ASKED TO SEE DR. NARANG AND/OR TO BE PUT ON DOCTOR LIST, BECAUSE LEG IS SWOLLEN AND THE SAME SYMPTOMS ARE REACORING FROM LEG AND BACK.
- 94.) ON 5/2 AND 5/3/2000 PLAINTIFF HAVE BEEN TAKEN TYLENOL AND MOLTRON. DEFENDANT CATHY KARADO TOLD PLAINTIFF HE WOULD SEE DEFENDANT, DOCTOR NARANG ON 5/4/2000.
- 95.) PLAINTIFF WENT TO THE MEDICAL DEPT. IN PRISON. ON 5-4-2000 TO SEE DEFENDANT, DR. NARANG, WHEREAS DEFENDANT CHECKED PLAINTIFF LEGS BY HITTING THEM WITH A RUBBER HAMMER FOR REFLEX REACTION RIGHT LEG DIDN'T REACT AS FAST WHEREAS DOCTOR HIT KNEE ON RIGHT LEG AT LESS 6 AND/OR 7 TIMES BEFORE MOVING, DEFENDANT, DR. NARANG HIT LEFT LEG
- 96.) IT MOVED THE FIRST HIT. DEFENDANT DOCTOR NARANG MADE AN APPOINTMENT FOR PLAINTIFF TO SEE ORTHOPEDIC, LEAVEN PLAINTIFF ON TYLENOL SAYING PLAINTIFF WOULD TO SUFFER A LITTLE WHILE FOUR A FEW DAYS TELL SOURCE OF PROBLEM IS FOUND.
- 97.) ALL THE EVENTS DESCRIBED IN THIS COMPLAINT WERE WITNESSED BY PRISONER(S) JAMMIE MCCABE, JOE WHALEN, EDDIE MILLER, ED THOMAS, JIMMY CULBERT, CHARLIE BROWN, SEE EXHIBITS AND EXHIBIT 2.
- 98.) ON INFORMATION AND BELIEF, THE POLICY AND PRACTICE OF SCH. Co. PRISON IS TO FORBID PRISONERS FROM CORRESPONDING WITH OTHER PRISONERS OR FROM TALKING WITH OTHER PRISONERS WHO ARE IN SEGREGATION OR ISOLATION, EVEN WHEN SUCH COMMUNICATION IS ESSENTIAL TO THE CONDUCT OF A LAWSUIT.

PART IV STATEMENT OF CLAIM DATE: 5/8/2000

- A.) DEFENDANT, COUNTY OF SCHUYLKILL, IS SUED IN ITS OFFICIAL CAPACITY AS IT OVERSEES SCH. CO. PRISON AND IS RESPONSIBLE FOR ACTIONS OF ALL COUNTY EMPLOYEES, THEREIN.
- B.) DEFENDANT, COUNTY OF SCHUYLKILL COMMISSIONERS OFFICE, IS SUED IN ITS CAPACITY AS IT OVERSEES PRISON DAILY OPERATIONS AND POLICY(S) OF SCH. CO. PRISON AND IS RESPONSIBLE FOR ACTIONS OF ALL SUBORDINATES, THEREIN.
- C.) DEFENDANT, COUNTY OF SCHUYLKILL COMMISSIONERS OFFICE, IS SUED INDIVIDUALLY AND IN THERE OFFICIAL CAPACITY, COLLECTIVELY; FORREST L. SHADLE, JEROME P. KNOWLES, STANLEY H. TOBASH, AS THEY OVERSEE ALL DAILY OPERATIONS AND POLICY(S) OF SCH. CO. PRISON AND IS RESPONSIBLE FOR ACTIONS OF ALL SUBORDINATES, THEREIN.
- D.) DEFENDANT, SCHUYLKILL COUNTY PRISON, IS SUED IN ITS OFFICIAL CAPACITY AS ALL ACTIONS MENTIONED IN THIS COMPLAINT HAPPENED WITHIN THE CONFINES OF THE SCH. CO. PRISON AND ACTIONS, THEREIN.
- E.) DEFENDANT, GERALD BRITTON, IS SUED IN HIS OFFICIAL CAPACITY AS WARDEN OF SCH. CO. PRISON AND ACTED AS SUCH AT ALL TIMES HEREIN, AND IS RESPONSIBLE FOR ACTIONS OF ALL SUBORDINATES, THEREIN.
- F.) DEFENDANT, GENE BERDINER, IS SUED IN HIS OFFICIAL CAPACITY AS DEPUTY WARDEN OF SCH. CO. PRISON AND ACTED AS SUCH AT ALL TIMES MENTIONED, HEREIN.
- G.) DEFENDANT, DAVID WARPINSKY, IS SUED IN HIS OFFICIAL CAPACITY AS CAPTAIN OF SCH. CO. PRISON AND ACTED AS SUCH AT ALL TIMES MENTIONED, HEREIN.
- H.) DEFENDANT, MICHAEL FLANNERY, IS SUED IN HIS OFFICIAL CAPACITY AS LIEUTENANT OF SCH. CO. PRISON AND ACTED AS SUCH AT ALL TIMES MENTIONED, HEREIN.

PART. IV STATEMENT OF CLAIM DATE: 5/8/2000

- I.) DEFENDANT, ANTHONY KANKOWSKI, IS SUED IN HIS OFFICIAL CAPACITY AS LIEUTENANT OF SCH. CO. PRISON AND ACTED AS SUCH AT ALL TIMES MENTIONED, HEREIN.
- J.) DEFENDANT, LAMOR GHERES, IS SUED IN HIS OFFICIAL CAPACITY AS LIEUTENANT OF SCH. CO. PRISON AND ACTED AS SUCH AT ALL TIMES MENTIONED, HEREIN.
- K.) DEFENDANTS, PAUL TAYLOR; STEVE BLOSCHICHAK; JOHN CARUSO; KEITH WITTING; JOE CONNORS; BILL KRUSS; TODD SETLOCK; IS SUED IN THERE OFFICIAL CAPACITY AS CORRECTIONAL OFFICERS OF SCH. CO. PRISON AND ACTED AS SUCH AT ALL TIMES MENTIONED, HEREIN.
- L.) DEFENDANT, MATT MORGAN, IS SUED IN HIS OFFICIAL CAPACITY AS HEARING EXAMINER OF SCH CO. PRISON AND ACTED AS SUCH AT ALL TIMES MENTIONED, HEREIN.
- M.) DEFENDANT, PATTY HOAKE, IS SUED IN ~~HER~~ OFFICIAL CAPACITY AS REGISTERED NURSE OF SCH. CO. PRISON AND ACTED AS SUCH AT ALL TIMES MENTIONED, HEREIN.
- N.) DEFENDANT, CATHY KARADO, IS SUED IN HER OFFICIAL CAPACITY AS REGISTERED NURSE OF SCH. CO. PRISON AND ACTED AS SUCH AT ALL TIMES MENTIONED, HEREIN.
- O.) DEFENDANT, DR. HARCHARAN NARANG, IS SUED IN HIS OFFICIAL CAPACITY AS DOCTOR OF SCH. CO. PRISON AND ACTED AS SUCH AT ALL TIMES MENTIONED, HEREIN.

SINCE TIME OF INCIDENT, IE. PLAINTIFF HAD BEEN RECEIVING UNEQUAL TREATMENT BY SCH. CO. PRISON AUTHORITIES AND EMPLOYEES THEREIN, WHO HAVE ACTED AND/OR ARE ACTING WITH DELIBERATE INDIFFERENCE TO PHYSICAL HEALTH OF INJURY, AND WELLING BEING OF PLAINTIFF AS WELL AS PRISON CONDITIONS, AND CONSTITUTIONAL RIGHTS AMENDMENTS 8TH, 5TH, AND 14TH SECTION ONE; FALSE INFORMATION, FALSE OBSERVATIONS, FALSE STATEMENTS, HARASSMENT RESULTING IN PHYSICAL AND MENTAL STRESS, PHYSICAL AND MENTAL CRUELTY. PLAINTIFF MUST ENSURE AS A RESULT OF HIS FEAR OF ASSAULT AND/OR OTHER RETALIATION, KNOWINGLY AND WILLINGLY SHOWING GROSS DISREGARD OF PLAINTIFF RIGHTS

PART V RELIEF

DATE: 5/8/2000

- 1.) PLAINTIFF BEATING FROM INMATES AND CORRECTIONAL OFFICERS INVOLVEMENTS, AND PRESENTS, WHICH PLAINTIFF SUFFERED CONSTITUTED CRUEL AND UNUSUAL PUNISHMENT IN VIOLATION OF THE EIGHTH AMENDMENT TO THE U.S. CONSTITUTION AND DUE PROCESS CLAUSE OF THE FOURTEENTH AMENDMENT. THE BEATING ALSO AMOUNTED TO PUNISHMENT WITHOUT DUE PROCESS OF LAW, IN VIOLATION OF THE FOURTEENTH AMENDMENT TO U.S. CONSTITUTION.
- 2.) DEFENDANTS FAILURE TO PROVIDE MEDICAL CARE NEEDED BY PLAINTIFF FOR LEG AND BACK PAIN, AND NO FOLLOW UP TREATMENT RESULTING IN THE LEAVELY OF FOREIGN BODY, CONTINUES PAIN LEAVING PLAINTIFF SCARED FOR LIFE WITH CONTINUES LEG AND BACK PAIN AS WELL AS LIVEN CONDITIONS MENTIONED IN THIS COMPLAINT CONSTITUTED CRUEL AND UNUSUAL PUNISHMENT AND PUNISHMENT WITHOUT DUE PROCESS OF LAW.
- 3.) DEFENDANT THREATS TO PUNISH PLAINTIFF FOR TAKING LEGAL ACTION, AND THEIR THREATS TO PUNISH PRISONERS WHO SUBMITTE AFFIDAVITS ON BEHALF PLAINTIFF, VIOLATED PLAINTIFF RIGHTS OF MEANINGFUL ACCESS TO THE COURTS, WHICH IS GUARANTEED BY THE DUE PROCESS CLAUSE OF THE FOURTEENTH AMENDMENT.
- 4.) PLAINTIFF HAVE NO PLAIN, ADEQUATE AND/OR COMPLETE REMEDY AT LAW TO REDRESS THE WRONGS DESCRIBED HEREIN. PLAINTIFF HAVE BEEN AND WILL CONTINUE TO BE IRREPARABLY INJURED BY THE CONDUCT OF THE DEFENDANTS AND INJUNCTIVE RELIEF WHICH PLAINTIFF SEEK.

WHEREFORE PLAINTIFF RESPECTFULLY PRAY THAT THIS COURT ENTER JUDGEMENT GRANTING PLAINTIFF:

- 1.) AN ORDER MOVED IN THIS COURT FOR APPOINTMENT OF COUNSEL, A MEMBER OF THE PENNSYLVANIA BAR, TO REPRESENT PLAINTIFF, BECAUSE SAMUEL E. PULLINS CANNOT AFFORD TO EMPLOY AN ATTORNEY, AND DON'T HAVE ADEQUATE KNOWLEDGE OF LAW, THIS MOTION IS BASED ON PLAINTIFF AFFIDAVIS IN SUPPORT OF HIS MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS, AND FOR

PART II RELIEF DATE: 5/8/2000

APPOINTMENT OF COUNSEL, LEGAL AUTHORITY FOR APPOINTMENT AND COMPENSATION OF COUNSEL IS 28 U.S.C. SEC. 1915(D), AND 18 U.S.C. SEC. 3006 A(G), AS INTERPRETED IN MC CLAIN VS. MANSON, 343 F. SUPP. 382 D. CONN. 1972.

2.) A DECLARATORY JUDGEMENT THAT THE DEFENDANTS' ACTS, POLICIES AND PRACTICES DESCRIBED HEREIN VIOLATE PLAINTIFF RIGHTS UNDER THE UNITED STATES CONSTITUTION.

3.) A PRELIMINARY AND PERMANENT INJUNCTION WHICH:

- A.) REQUIRES DEFENDANTS, GERALD BRITTON (WARDEN) TO REMOVE FROM THE PLAINTIFF PRISON FILES ANY WRITE-UP AND/OR OTHER REPORTS CONCERNING THESE EVENTS DESCRIBED, HEREIN AND PROHIBIT DEFENDANT, GERALD BRITTON FROM PERMITTING ANY SUCH REPORTS TO BE PLACED IN PLAINTIFF FILES AT ANY FUTURE TIME.
- B.) REQUIRES DEFENDANTS, GERALD BRITTON AND OTHER PRISON MEMBERS TO PAY DOCTOR BILL, AND TO CONTINUE TREATMENT FROM INJURY OF LEG AND BACK.
- C.) REQUIRES DEFENDANT, GERALD BRITTON AND OTHER PRISON MEMBERS TO RELEASE ALL MEDICAL RECORDS TO PLAINTIFF AND/OR PLAINTIFF LAW, AND ALL PARTS MISSING FROM MEDICAL RECORDS FROM DATE OF INCIDENT 10/26/99 TO 4/30/2000, AND IN THE FUTURE.
- D.) PROHIBIT DEFENDANTS, THEIR AGENTS, EMPLOYEES, SUCCESSORS IN INTEREST AND ALL OTHER PERSONS IN ACTIVE CONCERT AND/OR PARTICIPATION WITH THEM, FROM HARASSING, THREATENING, PUNISHING OR RETALIATING, IN ANY WAY AGAINST THE PLAINTIFF BECAUSE HE FILED THIS ACTION AND/OR AGAINST ANY OTHER PRISONERS BECAUSE THEY SUBMITTED AFFIDAVITS IN THIS CASE ON BEHALF OF PLAINTIFF OR FROM TRANSFERRING PLAINTIFF TO ANY OTHER INSTITUTION, WITHOUT THEIR EXPRESS CONSENT, DURING THE PENDENCY OF THIS ACTION.

PART. V RELIEF DATE: 5/8/2000

- 4.) COMPENSATORY DAMAGES IN THE AMOUNT OF \$100,000.00 TO PLAINTIFF.
- 5.) PUNITIVE DAMAGES IN THE AMOUNT OF \$100,000.00 TO PLAINTIFF.
- 6.) TRIAL BY JURY ON ALL ISSUES TRIABLE BY JURY.
- 7.) PLAINTIFF'S COST OF THIS SUIT.
- 8.) SUCH OTHER END FURTHER RELIEF AS THIS COURT MAY DEEM JUST, PROPER AND EQUITABLE.

DATE: 5/8/2000

RESPECTFULLY SUBMITTED,
SAMUEL E. PULLINS
SCH. CO. PRISON, 2ND AND SANDERSON ST. POTTSVILLE PA.
17901.

IN PROPRIA PERSONAM

I HAVE READ THE FOREGOING COMPLAINT AND HEREBY VERIFY THAT THE MATTERS ALLEGED THEREIN ARE TRUE, EXCEPT AS TO MATTERS ALLEGED ON INFORMATION AND BELIEF AND, AS TO THOSE, I BELIEVE THEM TO BE TRUE. I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED AT SCH. CO. PRISON, POTTSVILLE, PA.
ON DATE: 5/8/2000 * Samuel E. Pullins

EXHIBITS 13

DC-804
PART 1COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF CORRECTIONS
P.O. BOX 598
CAMP HILL, PA. 17001-0598

OFFICIAL INMATE GRIEVANCE

GRIEVANCE NO.

#2

TO: GRIEVANCE COORDINATOR

INSTITUTION

DATE

(WARDEN) BRITTON

SCHUYLKILL COUNTY PRISON

12-14-99

FROM: (Commitment Name & Number)

INMATE'S SIGNATURE

SAMUEL E. PULLINS

Samuel E. Pullins

WORK ASSIGNMENT

QUARTERS ASSIGNMENT

E-11 SOLIDERY CONFINEMENT

E-11

INSTRUCTIONS:

1. Refer to the inmate handbook Page 12 and DC-ADM 804 for information on the inmate grievance system.
2. State your grievance in Block A in a brief and understandable manner.
3. Next, you are required to list in Block B the specific actions you have taken to resolve this matter. Be sure to include the identity of staff members you have contacted.

A. Brief, clear statement of grievance: UNDER THE 801 RULES OF COUNTY PRISON PROCEDURES YOU DIDN'T RESPOND TO MY APPEAL WITHIN 30 DAYS. YOUR OFFICERS (GOTAYLAR, 96 CAUSE, 96 QUATTING LIED AND FALSIFIED DOCUMENTS FICTITIOUSLY DIVESTING THE AUTHORITY OF THE COUNTY PROCEDURES IN THIS WRITE-UP ON 10-26-99. IN REFERENCE OF THE ALLEGED VIOLATIONS OF MY CONSTITUTIONAL RIGHTS P.14 IL ETC. THAT HAS BEEN COMMITTED BY THE SCHUYLKILL COUNTY PRISON FOR INAPPROPRIATELY ALLOWING THE CIRCUMSTANCES IN WHICH MY LIFE WAS AT STAKE AND IN SERIOUS JEOPARDY. WHEREFORE THE ADMINISTRATION HAS SUCCESSFULLY ALLOWED SUCH ATTACK AGAINST MY LIFE, DURING THIS ALTERCATION BETWEEN ME AND ANOTHER INMATE (GOMEZ R.) THE GUARD MADE NO ATTEMPT TO SUBDUCE HIM FROM ASSAULTING ME WITH A MOP RINGER. THEREFORE I'VE TRIED TO UNDICATE THE NATURE OF THE FACTS THROUGH GRIEVANCES BUT UNFORTUNATELY THE (WARDEN) BRITTON REFUSE TO ACKNOWLEDGE THE MANNER OF MY REQUEST TO SEEK RELIEF AND SURELY I REMONSTRATE THAT THE COMPLAINT I'M MAKING HAVE MERIT TOWARDS THEY REMISS NEGLIGENCE OF THE INCIDENT. FOR ALLOWING ME TO BE ASSAULTED BRUTALLY BY THIS INMATE (GOMEZ R.) WHILE THE CORRECTIONAL OFFICERS WAS PRESENT, THEREFORE AFTER I WAS SUBDUED THEY LET (INMATE) GOMEZ R. GO TO PROCEED IN HIS ATTACK AGAINST ME. WHICH CAUSED SERIOUS BODILY INJURY TO MY PERSON, WHEREAS MY PERSON HAD TO RECEIVE TREATMENT AT POTTSVILLE HOSPITAL BY HAVING STITCHES PUT IN MY RIGHT LEG. THEN THIS ADMINISTRATION DENIED ME PROPER TREATMENT OF GOING BACK TO THE DOCTOR TO HAVE STITCHES REMOVED IN RE-SORT OF SCRAMORSE REMOVED ALL BUT ONE STICHE OUT OF MY LEG 11-12-99. NOW THE HOSPITAL IS SENDING (12-13-99) MY PERSON BILLS ON THESE INJURES FROM THIS INCIDENT THROUGH SCHUYLKILL COUNTY PRISON INVOLVEMENT OF THESE INJUSTICE THAT HAS BEEN DONE AGAINST ME.

B. Actions taken and staff you have contacted before submitting this grievance: I APPEALED MY WRITE-UP TO (WARDEN) BRITTON STATING I DIDN'T DO ANYTHING WRONG AND ASKED THAT SOMETHING BE DONE ABOUT THIS TIME IN THE (HOLE) BECAUSE I'M THE ONLY PERSON BE PUNISHED WHEREAS (INMATE) GOMEZ R. HAS LEFT S.C.P. NO RESPONSES. THIS IS MY SECOND GRIEVANCE TO (WARDEN) BRITTON. MY PERSON RECEIVED A DOCTOR BILL FOR THIS INCIDENT OF MY INJURES. SCHUYLKILL COUNTY PRISON AS TO MY THIS BILL IT HAPPENED IN THERE CARE, SO I GIVE THE BILL (SUPERVISOR) FLANNERY ASKING FOR A RECIEF SHOWING THAT THIS BILL HAS BEEN PAID. NO RESPONSES OR RELIEF IN ANY MANNER OF REQUEST.

Your grievance has been received and will be processed in accordance with DC-ADM 804.

Signature of Grievance Coordinator

Date

SCHUYLKILL COUNTY PRISON

Pottsville, Pennsylvania

CASE NO: 1995CONDUCT COMPLAINT

RESIDENT

Pullins, S. (F-K)

DATE

10-26-99

TIME

7:20 PM

TIME AND DATE

OF HEARING

10/29/99 @ 10am

INCIDENT: On the above date and time this C/O along with C/O CARUSO, C/O Bloschichak, C/O Wittig, and Supt. Kankowski were called to F-BIK for a fight. When in F-BIK Res. Pullins, S. had a handle from the map. Res. Gomez, R. was swinging a map ringer at Res. Pullins, S. Res. Brown, C. was trying to break the fight up. After the fight was broke up all the residents of F-BIK were locked down.

CLASS 1 MISCONDUCTS

- ④ CARRYING A DEADLY WEAPON
- ⑫ RIOTING OR INCITING A RIOT
- 13. CONSPIRACY TO RIOT OR DISRUPT NORMAL INSTITUTION ROUTINE
- 15. THREATENING AN EMPLOYEE OR INMATE WITH BODILY HARM OR INJURY
- ⑮ ASSAULTS AND FIGHTING
- 18. REFUSING TO OBEY AN ORDER
- 20. BREAKING RESTRICTIONS OR QUARANTINE
- 31. INSOLENCE OR DISRESPECT TOWARD A STAFF MEMBER
- 33. VIOLATION OF ADMINISTRATIVE DIRECTIVES NOT SPECIFICALLY ENUMERATED

COMPLAINING OFFICER

C/O Taylor

RESIDENT WITNESSES:

- 1. JAMMIE McCABE
- 2. JOE WIALEN
- 3. EDDIE MILLER
- 4. ED THOMAS
- 5. JIMMY CULBERT
- 6. CHARLIE BROWN

STAFF WITNESSES:

- 1. C/O CARUSO
- 2. C/O Bloschichak
- 3. _____
- 4. _____
- 5. _____
- 6. _____

EXHIBIT 3

Res

SCHUYLKILL COUNTY PRISON
Pottsville, Pennsylvania

CASE NO: 2035CONDUCT COMPLAINT

RESIDENT Pullins, S DATE 7-13-00
TIME 4:00 TIME AND DATE OF HEARING 2/17/00 @ 1pm

INCIDENT: On above date & Time after serving Trays in Fblk

there was an extra tray on the Cart, Res. Pullins, S asked me if he could have the tray I told him no. After telling him no he started using profane language directed toward me while he was walking to his seat. I walked up to him and asked what he said He told me nothing don't worry about it will talk later. While loc the inmates down on Fblk I went to his cell to give me a war at which point he started putting on his sneakers & told me what ever I got to say, say it now at which point I called for other officers & told him he is majoed

COMPLAINING OFFICER C/O Kurn

RESIDENT WITNESSES:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____

STAFF WITNESSES:

1. C/O Blotchak
2. _____
3. _____
4. _____
5. _____
6. _____

SCHUYLKILL COUNTY PRISON

EXHIBITS #4

Pottsville, Pennsylvania

RESIDENT Pullins, S
PRISON NO. _____

CASE NO: _____
TIME: 4:40
DATE: 2-13-00

RESULTS OF HEARING:

Violation of the Following Class 1 Misconducts

#12 Rioting or inciting to Riot

#13 Disrupt normal institution routine that could result in bodily injury to personnel or inmates.

#31 Insolence or disrespect toward a staff member

#33 Violation of administrative directives not specifically enumerated

FINDING: GUILTY NOT GUILTY

DISPOSITION:

ATTENDED HEARING:

1. _____

3. _____

2. _____

4. _____

WARDEN'S SIGNATURE

EXHIBITS #5

E

SCHUYLKILL COUNTY PRISON

Pottsville, Pennsylvania

Resident

RESIDENT SAM PULLINS
PRISON NO. _____

CASE NO: 2035TIME: 6PMDATE: 2/17/00

RESULTS OF HEARING:

BOARD: C/O HERRING, TAYLOR, LT GEHRES
CHAired: LYNN BUCHLER

C/O KRUSS:

READ CONDUCT REPORT TO BOARD & RES. PULLINS.

BUCHLER:

IS THE REPORT TRUE AS STATED?

KRUSS:

YES.

BUCHLER:

HOW DO YOU PLEA?

PULLINS:

NOT GUILTY TO 12, 13, 33

BUCHLER:

DO YOU HAVE ANYTHING TO SAY?

PULLINS:

I DIDN'T DO ANYTHING OF WHAT HE SAID IN THE REPORT. I DIDN'T
SAY ANYTHING I WAS IN MY CELL. HE GAVE SOMEONE ELSE SOMETHING
OFF THE TRAY. I ASKED FOR THE REST OF IT, HE SAID "NO".
I WAS CURSEING THAT HE GAVE TO OTHERS BUT NOT TO ME.

FINDING: X GUILTY NOT GUILTY

DISPOSITION: GUILTY TO #13, 31 - 10 DAYS EACH. 20 DAYS - CREDIT FOR TIME SERVED
4 DAYS. 16 DAYS REMAINING ON "F" BLOCK.

ATTENDED HEARING:

1. Lynn Buchler3. C/O Herring2. C/O Taylor4. LT Gehres

Paul F. Butts
WARDEN'S SIGNATURE

Pottsville, Pennsylvania

CASE NO: 404/7CONDUCT COMPLAINTRESIDENT Pullins, Sam DATE 2/21/00TIME 8:45 pm TIME AND DATE OF HEARING 2/28/00 @ 10:45pm

INCIDENT:

On above date & time when Lt. Gehres was giving meds out in F-blk., res. Pullins was yelling at Lt. Gehres stating that "they were not his meds. I C/O Connors told res. Pullins to Lock up at which time res. Pullins started cursing this C/O as he was going up to his cell on the top tier.

The following are Class I Misconducts:

- # ⑫ - Rioting or inciting to riot
- # ⑬ - Disrupting normal institution routine that could result in bodily injury to personnel or inmates.
- # ⑮ Refusing to obey an order.
- # ③① Insolence or disrespect toward a staff member.

COMPLAINING OFFICER C/O Connors

RESIDENT WITNESSES:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____

STAFF WITNESSES:

1. Lt. Gehres
2. _____
3. _____
4. _____
5. _____
6. _____

- # ③③ Violation of administrative directives not specifically enumerated

EXHIBIT # 7

UNII,
Dr. Naring perscribed Motrin or Tylenol. Dr. Naring is the only one
who can recommend something stronger. For now your chart reads
Motrin (PRN) - or Tylenol - whichever works better. Write to me if
you have any more questions.

Wif
2-22-00

SCHUYLKILL COUNTY PRISON

Pottsville, Pennsylvania

RESIDENT SAM PULLINS
PRISON NO. _____

CASE NO: 2047
TIME: 6:45
DATE: 2/28/00

RESULTS OF HEARING: **BOARD:** C/O BOWERS & WITTIG
CHAired: LYNN BUCKLER

C/O CONNORS: READ CONDUCT REPORT TO BOARD & RES. PULLINS

BUCHLER: IS THE REPORT TRUE AS STATED?

CONNORS: YES.

BUCHLER: HOW DO YOU PLEA?

PULLINS: NOT GUILTY TO ALL

BUCHLER: DO YOU HAVE ANYTHING TO SAY?

PULLINS: I DIDN'T DO ANY OF THIS.. I NEED MEDS FOR MY BACK & LEGS.
WAS TO GET LODINE 400 MG. I FEEL THIS IS HARASSMENT.
I SAW THE DOCTOR ON 2/16. FOR 5 DAYS AND DIDN'T GET NOTHING.

FINDING: X **GUILTY** **NOT GUILTY**

DISPOSITION: GUILTY TO #13 - 15 DAYS, #31 - 15 DAYS. TOTAL 30 DAYS. CREDIT FOR
7 DAYS SERVED. 23 DAYS TOTAL. CS TO OTHER SENTENCE

ATTENDED HEARING:

1. [Signature]
2. [Signature]

3. [Signature]
4. _____

[Signature]
WARDEN'S SIGNATURE

SCHUYLKILL COUNTY PRISON 7/29/87
COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF CORRECTIONS

INSTRUCTIONS

Complete Items Number 1-7. If you follow instructions in preparing your request, it can be disposed of more promptly and intelligently.

INMATE'S REQUEST TO STAFF MEMBER

1. TO: (NAME AND TITLE OF OFFICER)

(WARDEN) BRITTON

2. DATE

2/22/2000

3. BY: (INSTITUTIONAL NAME AND NUMBER)

SAMUEL PULLINS

4. COUNSELOR'S NAME

JOE

5. WORK ASSIGNMENT

E-3

6. QUARTERS ASSIGNMENT

E-3

7. SUBJECT: STATE COMPLETELY BUT BRIEFLY THE PROBLEM ON WHICH YOU DESIRE ASSISTANCE. GIVE DETAILS.

NOW, I WRITE YOU A REQUEST SLIP YESTERDAY ABOUT NOT GETTING MEDICATION THE DOCTOR PRESCRIBED TO ME. I GAVE THAT REQUEST SLIP TO THE (SUPERVISOR) FLANNERY. I SEE THE DOCTOR LAST WEDNESDAY 2/16/2000. (SUPERVISOR)'S FLANNERY TOLD MY PERSON EVERYDAY FROM 2/17 - 2/20/2000 THE NURSE CATHY ORDERED IT, BUT IT HASN'T GOT HERE, YET. (SUP.) LAMAR TOLD ME ~~THE~~ FROM 2/17 - 2/20/2000 NOTHING IN THE BOOK FOR ME. NOW TODAY, LAMAR CAME ON F-BLOCK I WENT DOWN THE STAIRS TO GET MEDICATION. LAMAR ~~TRIED~~ TRIED TO GIVE ME MOTRON, I REFUSED TO TAKE IT BECAUSE THE DOCTOR DIDN'T PRESCRIBE IT TO ME WHEREAS EARLIER THAT MORNING THE (NURSE) CATHY SAID MY MEDS. WAS HERE. SO LAMAR GOT

8. DISPOSITION: (DO NOT WRITE IN THIS SPACE)

SMART CALLING ME OUT OF MY NAME TALKING ABOUT GO LOCK-UP. I SAID, I'M GOING AS I WAS EXPLAINING TO HIM MY SITUATION. HE HAS BEEN HARASSING ME OVER THIS EVERYTIME I GO TO THE CART. NOW, I WAS PUT IN THE HOLE. THE GUARD JOE C. STARTED GETTING SMART, SO I TOLD HIM HE DON'T EVEN NO WHAT'S GOING ON MY BACK & LEGS BEEN HURTING ME EVERY SENSE I WAS HIT ON MY LEG WITH A MAP RINGER, NOW I'M BEING DENIED MEDICAL TREATMENT.

RN Cathy,

2 meds - ? 451- Tylenol

* - Motrin

could've been not written
in the book.

☐ TO DC-14 CAR ONLY☐ TO DC-14 CAR AND DC-15 IRS

STAFF MEMBER

DATE

SCHUYLKILL COUNTY PRISON 7/29/87
COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF CORRECTIONS

INMATE'S REQUEST TO STAFF MEMBER

INSTRUCTIONS

Complete Items Number 1-7. If you follow instructions in preparing your request, it can be disposed of more promptly and intelligently.

1. TO: (NAME AND TITLE OF OFFICER) (WARDEN) BRITTON		2. DATE 4/10/2000
3. BY: (INSTITUTIONAL NAME AND NUMBER) SAMUEL E. PULLINS #010381		4. COUNSELOR'S NAME JOE
5. WORK ASSIGNMENT Block F cell 17	6. QUARTERS ASSIGNMENT	

7. SUBJECT: STATE COMPLETELY BUT BRIEFLY THE PROBLEM ON WHICH YOU DESIRE ASSISTANCE. GIVE DETAILS.

I SEEN DR. NARANG 3/8/2000. HE PUT MY PERSON ON (WATSON 418) (1) PILL AND (RELAFEN 500+250) (1 1/2) PILLS. THEN TOLD MY PERSON TO COME BACK IN TEN DAYS TO TELL HIM HOW THESE MEDICATIONS WAS WORKING. MY PERSON SIGN UP TO SEEN DR. NARANG 3/21/2000. THE NURSE CATHY CAME TO E-BLOCK (THE HOLE) TELLING MY PERSON THE DR. SAID I CAN HAVE (RELAFEN) ANY TIME BUT TAKE WATSON 418 ONLY (7) MORE DAYS AND THAT'S IT. I SIGNED-UP TO SEE THE DOCTOR AGAIN (NURSE) CATHY PUT ME BACK ON WATSON 418 WITHOUT SEENDING THE DOCTOR, THIS WAS 3/30/2000. I SIGN-UP TO SEE THE DOCTOR 4-3-2000, I SEEN (NURSE) CATHY 4-6-2000. I ASKED (NURSE) CATHY ABOUT SEEING DR. NARANG, BECAUSE SHE TOOK ME OFF WATSON 418

8. DISPOSITION: (DO NOT WRITE IN THIS SPACE)

AND PUT MY PERSON ON WATSON 418 WITHOUT MY PERSON SEEING OR EXPLAINING THE EFFECT OR THE WAY I FEEL FROM MEDICATION WATSON 418 TO DR. NARANG.

I GAVE BOTH PARTS #1 & #2 TO L.T. FLANNERY
Samuel E. Pullins
4/10/2000

☐ TO DC-14 CAR ONLY☐ TO DC-14 CAR AND DC-15 IRS

STAFF MEMBER

DATE

EXHIBIT #11

COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF CORRECTIONS

INMATE'S REQUEST TO STAFF MEMBER

PART #2

INSTRUCTIONS

Complete Items Number 1-7. If you follow instructions in preparing your request, it can be disposed of more promptly and intelligently.

1. TO: (NAME AND TITLE OF OFFICER) (WARDEN) BRITTON		2. DATE 4/10/2000
3. BY: (INSTITUTIONAL NAME AND NUMBER) SAMUEL E. PULLINS #010381		4. COUNSELOR'S NAME JOE
5. WORK ASSIGNMENT Block-F, Cell #17	6. QUARTERS ASSIGNMENT	
7. SUBJECT: STATE COMPLETELY BUT BRIEFLY THE PROBLEM ON WHICH YOU DESIRE ASSISTANCE. GIVE DETAILS.		
<p>4/7/2000, I WAS GIVEN NO MEDICATION THAT MORNING AND (500 mg) RELAFEN THAT NIGHT. 4/8/2000, I WAS GIVEN NO MEDICATION THAT MORNING AND A MOTTRON THAT NIGHT. 4/9/2000, I WAS GIVEN NO MEDICATION THAT MORNING, I SEEN NURSE CATHY WALKING BY F-Block AT ABOUT 4:30 P.M. AND TRIED TO ASK WHY I'M NOT GETTING THE MEDICATION DOCTOR NARANG PRESCRIBED TO MY PERSON WATSON 418 AND 500+250 RELAFEN. SHE SAID WRITE HER UP. I'M IN CONTINUES PAIN FROM THE BOTTOM OF MY LEG TO THE MIDDLE OF MY BACK FROM A INJURY THAT HAPPENED TO ME WHILE AT SCH. CO. PRISON, 10-26-99. WHERE AS (NURSE) PATTY HOAKE DIDN'T HAVE ANY DOCTOR(S) PERMISSION TO TAKE FOREIGN BODY</p>		
8. DISPOSITION: (DO NOT WRITE IN THIS SPACE)		
<p>OUT OF MY LEG, SHE DIDN'T HAVE ENOUGH SCHOOLING TO MAKE THAT DECISION, SHOWING FROM LEAVING A PART OF FOREIGN BODY IN MY RIGHT LEG. NOW (NURSE) CATHY KARADO, DONT HAVE ENOUGH SCHOOLING TO MAKE DOCTOR DECISIONS AS SHOWN IN THIS MATTER, AS WELL AS DENYING MY PERSON MEDICAL TREATMENT.</p> <p>I GAVE BOTH PARTS #1 & #2 TO L.T. FLANNERY</p> <p>Samuel E. Pullins</p>		
<input type="checkbox"/> TO DC-14 CAR ONLY		<input type="checkbox"/> TO DC-14 CAR AND DC-15 IRS
STAFF MEMBER		DATE

EXHIBIT "12"

Date:04/20/2000

Time:14:23

Receipt#:31556

Inmate Information

Name:PULLINS, SAMUEL E.

Booking#:010925

PCP#:010381

SS#:267-79-1910

Beginning Balance:106.61

Ending Balance:101.61

Housing Information

Section:MAIN

Block:E

Cell:8

Bed:1

Date/Time	Code	Amount
Description	Type	Check
04/20/2000 14:23	Withdrawal	-5.00
SICK CALL 4-10-0 ME		
DLN#:		

Total All Transactions	-5.00
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=====
Inmate Signature Line